

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Darnell Brown, Jeremiah Jones, Ronald Turner, and
Terri Coleman, and, on behalf of themselves and others
similarly situated in the proposed FLSA Collective
Action,

1:23-cv-03029

STIPULATION

Plaintiffs,

– against –

CE SOLUTIONS GROUP, LLC, CE SOLUTIONS
INC., CE RESERVE CORP., CE FLAGGING PLUS
CORP., ARGANI, INC., HASSAN SABLINI, and
JEANNINE NAPOLEONE-COLBERT,

Defendants.

WHEREAS The parties are engaged in settlement discussions, have agreed in principle,
and are reviewing draft settlement agreement language.

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel
as follows:

The time for Defendants CE Solutions Group, LLC, CE Solutions, Inc., CE Reserve Corp.,
CE Flagging Plus Corp., Argani, Inc. Hassan Siblini and Jeannine Napoleone-Colbert to move or
otherwise respond to the Complaint in the above-captioned action is hereby extended to October
2, 2023.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in
counterparts, and electronic or facsimile signatures shall have the same force and effect as
originals.

DATED: New York, New York
August 30, 2023

Levin-Epstein & Associates, P.C.

Attorneys for Plaintiffs

By: /s/ Jason Mizrahi

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SO ORDERED:

U.S.D.J.